

United States District Court
Eastern District of Missouri

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DECLARATION

On this 30 day of April 2020, Dr. Laurie Punch, says the following under the penalty of perjury that the following is true and correct:

1. My name is Dr. Laurie Punch. I am a legal resident of the United States.
2. I am a trauma surgeon and critical care doctor in St. Louis. I am the president of Power4STL a non-profit organization that works to reduce the impact of violence in the St. Louis region.
3. In addition to my role as a trauma surgeon, I am the Director of Medical Student Community Engagement and a resident scholar at the Washington University Institute for Public Health. I represent myself in this declaration and do not represent the university in this statement.
4. I have been involved in street outreach to the unhoused for the past year. I have personally visited encampments in Downtown St. Louis since the COVID-19 Crisis began.
5. As a medical doctor and public health professional, I have taken efforts to familiarize myself with Centers for Disease Control (CDC) guidance on preventing the spread of COVID-19 among vulnerable populations, including the unhoused.
6. The CDC interim guidance on preventing COVID-19 instructs that “Unless individual housing units are available, do not clear encampments during community spread of COVID-19. Clearing encampments can cause people to disperse throughout the community and break connections with service providers.” People Experiencing Homelessness and COVID-19: Interim Guidance, Centers for Disease Control (Mar. 22, 2020), <https://www.cdc.gov/coronavirus/2019-ncov/community/homeless-shelters/unsheltered-homelessness.html>.

7. In my professional opinion, St. Louis City is endangering unhoused individuals and the community at large if it does not follow this guidance.

8. Specifically, the rushed actions of the city to pressure those in the encampment to move from their home is deeply traumatizing and has not engaged with the residents in a constructive way. The residents have not had adequate notice of the time to evacuate and have not been given assurance of a safe and supportive alternative. The residents of the encampment have not been given adequate access to medical screening to allow for safe transition into shelter.

9. While providing outreach at the Market Street encampments, I have personally observed the unhoused residents of the encampment being approached by city officials in a way which was not trauma informed including threatening those who agreed to go into shelter with loss of their bed if they did not remove their belongings from the encampment. I have seen a hand washing station placed at the encampment and then removed within one day to great disappointment of the residents. I have advocated for individuals to gain access to shelter beds, at times with success but at times without access to a bed. Residents have shared with me they have been waiting for beds but have not had access.

10. These observations have led me to conclude that there is inadequate infrastructure and beds in place to support the safe transition of the encamped individuals into shelter at this time, and that by evicting these individuals, the city is actively putting them at risk. This risk in turn creates a greater risk of increased COVID19 cases throughout the entire region, representing a further crisis in our public health.

10. Clearing encampments of unhoused individuals without guarantees of sufficient individual housing is against the consensus of medical and public health officials.

A handwritten signature in black ink, appearing to read 'Laurie Punch', written over a horizontal line.

Laurie Punch, M.D